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9 Attorneys for  
PETRO-CANADA AMERICA LUBRICANTS, INC.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 IN RE:  
14 PG&E CORPORATION,  
15 - AND -  
16 PACIFIC GAS AND ELECTRIC  
17 COMPANY,  
18 DEBTORS.

Bankruptcy Case No. 19-30088 (DM)

CHAPTER 11

(Lead Case) (Jointly Administered)

**DECLARATION OF MICHAEL  
GLUCK IN SUPPORT OF  
RESPONSE IN OPPOSITION TO  
DEBTORS' FIRST OMNIBUS  
REPORT AND OBJECTION TO  
CLAIMS ASSERTED PURSUANT TO  
11 U.S.C. § 503(B)(9)**

Date: August 14, 2019  
Time: 9:30 a.m.  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

CASE NO.: 19-30088 (DM)

1 Pursuant to 28 U.S.C. § 1746, I, Michael Gluck, hereby declare as follows:

2 I am the Senior Manager, Credit & Collections for The HollyFrontier  
3 Companies. Petro-Canada America Lubricants, Inc. ("**PCLI**") is a subsidiary of  
4 The HollyFrontier Companies. I submit this Declaration in support of the  
5 Response in Opposition to the Debtors' First Omnibus Report and Objection to  
6 Claims Asserted pursuant to 11 U.S.C. § 503(b)(9) (the "**Response**"), filed  
7 contemporaneously with this Declaration.<sup>1</sup>

8 In my current position, I am responsible for all credit files and collections of  
9 outstanding invoices owed to PCLI. I am generally familiar with PCLI's  
10 operations and the goods provided to the Debtors and the invoices generated  
11 through the Debtors' invoice processing system. I have personal access to the  
12 invoice processing system and have reviewed the invoices currently outstanding as  
13 owed by the Debtors.

14 On April 18, 2019, PCLI filed its Proof of 503(b)(9) Claim (the "**Claim**") in the  
15 amount of \$34,268.28 for automobile lubricants and other goods delivered to the  
16 Debtors within the twenty (20) day period preceding the Petition Date. PCLI  
17 included invoices that substantiated the Claim. PCLI further reserved the right to  
18 amend its Claim.

19 I reviewed the Objection filed by the Debtors, and the stated reasons for the  
20 Objection to the Claim, identified as Claim Number 2505. I subsequently  
21 reviewed the invoices supporting the Claim and the history of payments made in  
22 the invoice processing system. I discovered that some of the invoices included in  
23 the Claim were paid. PCLI now has six (6) unpaid invoices (the "**Invoices**") for  
24 goods delivered during the twenty (20) day period preceding the Petition Date.  
25 The Invoices now total \$11,427.89, and are attached as Exhibit A to this  
26 Declaration.

27  
28 <sup>1</sup> Capitalized terms shall have the meaning ascribed them in the Response.

1 The business relationship between the Debtors and PCLI is that after the  
2 goods are ordered, a representative of the Debtors provides authorization for PCLI  
3 to process payment via a credit card on file. Payment via credit card may be for  
4 one or more invoices. It is possible that a representative of the Debtor believed  
5 that authorization was given to process the payment via credit card, and  
6 subsequently marked the Invoices as paid. However, as of the date of this filing, I  
7 declare that the Invoices submitted to the Debtors' invoices processing system in  
8 the amount of \$11,427.89 are currently unpaid.

9 I have reviewed the Response and it accurately states the facts concerning  
10 the Invoices and the amount still owed by the Debtors for goods delivered within  
11 twenty (20) days of the Petition Date. If called upon to testify, I would testify to  
12 these same facts set forth in this Declaration. I am authorized to submit this  
13 Declaration on behalf of PCLI.

14  
15 I declare under penalty of perjury that, to the best of my knowledge, and  
16 after reasonable inquiry, the foregoing is true and correct.

17 Executed this 30<sup>th</sup> day of July, 2019.

18  
19   
20 Michael Gluck

# EXHIBIT A

**Petro-Canada America Lubricants LLC**

115 N. Oak Park Avenue #1C

Oak Park, IL 60301-1366

United States

**Invoice***When remitting  
please quote*

Invoice number	Customer number
922285495	3098706
Date	Page
Jan 18, 2019	1

**Sold to:**

PACIFIC GAS & ELECTRIC COMPANY  
SACRAMENTO GARAGE - SAR  
5555 FLORIN PERKINS ROAD  
SACRAMENTO CA 95826-4815  
UNITED STATES

**Shipped to:**

PACIFIC GAS & ELECTRIC COMPANY  
SACRAMENTO GARAGE - SAR  
5555 FLORIN PERKINS ROAD  
SACRAMENTO CA 95826-4815  
UNITED STATES

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	SACRAMENTO	712417846	J0427-853135
Inco terms	Supply point		
ZCR	A77133 RAMOS OIL CO., INC		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
DHP15BLK	DURON HP 15W-40 BULK	CA	105.000	USG	9.7100	1,019.55
DDMVATFDRM	DURADRIE MV SYNTHETIC ATF 205 L DRUM	CA	2.000	DRM	693.2000	1,386.40
	<b>** Sub-total **</b>					<b>2,405.95</b>
	CALIFORNIA USED OIL RECYCLING PROGRAM					51.19
	213.311USG \$24.00/ 100USG					
	CALIFORNIA MOTOR OIL FEE					5.25
	105.000USG \$5.00/ 100USG					
	Sales Tax					198.49
	@ 8.250%					

Terms	Payment due date	Total	
Due 30 Days from Invoice Date	Feb 17, 2019	2,660.88	US Dollar
Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)			

Please direct inquiries to:

Inquiries : [pcaorders@petrocanadalsp.com](mailto:pcaorders@petrocanadalsp.com)

Sales : Arthur Gomez 877 730-2369

Please remit payment to:

Petro-Canada America  
Bank of America  
PO Box 74008917  
Chicago, IL 60674-8917

Remarks

Receive invoices electronically to avoid service charge fees (see reverse for details)

PACIFIC GAS & ELECTRIC COMPANY  
SACRAMENTO GARAGE - SAR  
5555 FLORIN PERKINS ROAD  
SACRAMENTO CA 95826-4815  
UNITED STATES

Please refer to our Standard Terms and Conditions of Sale, available on our website at  
[www.lubricants.petro-canada.ca/termsandconditions](http://www.lubricants.petro-canada.ca/termsandconditions)

Invoice Mailing/Faxing Fees

Canadian \$ - \$2.00 per mailed invoice / \$1.00 per faxed invoice

US \$- \$2.00 per mailed invoice / \$1.00 per faxed invoice

GBP - 2 GBP per mailed invoice / 1 GBP per faxed invoice

EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.

B209EPCA

**Petro-Canada America Lubricants LLC**

115 N. Oak Park Avenue #1C

Oak Park, IL 60301-1366

United States

**Invoice***When remitting  
please quote*

Invoice number	Customer number
922285510	3098712
Date	Page
Jan 21, 2019	1

**Sold to:**

PACIFIC GAS & ELECTRIC COMPANY  
PLACERVILLE GARAGE - PLG  
4636 MISSOURI FLAT ROAD  
PLACERVILLE CA 95667-6823  
UNITED STATES

**Shipped to:**

PACIFIC GAS & ELECTRIC COMPANY  
PLACERVILLE GARAGE - PLG  
4636 MISSOURI FLAT ROAD  
PLACERVILLE CA 95667-6823  
UNITED STATES

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	BOB ROSS	712417852	J0429-853155
Inco terms	Supply point		
ZCR	A77133 RAMOS OIL CO., INC		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
DHP15BLK	DURON HP 15W-40 BULK	CA	145.000	USG	9.7100	1,407.95
	<b>** Sub-total **</b>					1,407.95
	CALIFORNIA USED OIL RECYCLING PROGRAM					34.80
	145.001USG \$24.00/ 100USG					
	CALIFORNIA MOTOR OIL FEE					7.25
	145.001USG \$5.00/ 100USG					
	Sales Tax					102.08
	@ 7.250%					

Terms	Payment due date	Total	
Due 30 Days from Invoice Date	Feb 20, 2019		1,552.08 US Dollar
Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)			

Please direct inquiries to:

Inquiries : [pcaorders@petrocanadalsp.com](mailto:pcaorders@petrocanadalsp.com)

Sales : Arthur Gomez 877 730-2369

Please remit payment to:

Petro-Canada America  
Bank of America  
PO Box 74008917  
Chicago, IL 60674-8917

Remarks

Receive invoices electronically to avoid service charge fees (see reverse for details)

PACIFIC GAS & ELECTRIC COMPANY  
PLACERVILLE GARAGE - PLG  
4636 MISSOURI FLAT ROAD  
PLACERVILLE CA 95667-6823  
UNITED STATES

Please refer to our Standard Terms and Conditions of Sale, available on our website at  
[www.lubricants.petro-canada.ca/termsandconditions](http://www.lubricants.petro-canada.ca/termsandconditions)

Invoice Mailing/Faxing Fees

Canadian \$ - \$2.00 per mailed invoice / \$1.00 per faxed invoice

US \$- \$2.00 per mailed invoice / \$1.00 per faxed invoice

GBP - 2 GBP per mailed invoice / 1 GBP per faxed invoice

EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.



**Petro-Canada America Lubricants LLC**

115 N. Oak Park Avenue #1C

Oak Park, IL 60301-1366

United States

**Invoice**When remitting  
please quote

Invoice number	Customer number
922291268	3098676
Date	Page
Jan 25, 2019	1

**Sold to:**

PACIFIC GAS & ELECTRIC COMPANY  
ANGELS CAMP GARAGE - ANG  
1108 MURPHY'S GRADE ROAD  
ANGELS CAMP CA 95222-9616  
UNITED STATES

**Shipped to:**

PACIFIC GAS & ELECTRIC COMPANY  
ANGELS CAMP GARAGE - ANG  
1108 MURPHY'S GRADE ROAD  
ANGELS CAMP CA 95222-9616  
UNITED STATES

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	ANGEL CAMP	712421259	J057A-1177565
Inco terms	Supply point		
ZCR	A77133 RAMOS OIL CO., INC		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
DHP15BLK	DURON HP 15W-40 BULK	CA	110.000	USG	9.7100	1,068.10
MOSYN53C12	SUPREME SYNTHETIC 5W-30 12X1L CASE	CA	4.000	C12	44.0200	176.08
	<b>** Sub-total **</b>					<b>1,244.18</b>
	CALIFORNIA USED OIL RECYCLING PROGRAM					29.44
	122.680USG \$24.00/ 100USG					
	CALIFORNIA MOTOR OIL FEE					6.13
	122.680USG \$5.00/ 100USG					
	Sales Tax					90.21
	@ 7.250%					

Terms	Payment due date	Total	1,369.96 US Dollar
Due 30 Days from Invoice Date	Feb 24, 2019		
Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)			

Please direct inquiries to:

Inquiries : [pcaorders@petrocanadalsp.com](mailto:pcaorders@petrocanadalsp.com)

Sales : Arthur Gomez 877 730-2369

Please remit payment to:

Petro-Canada America  
Bank of America  
PO Box 74008917  
Chicago, IL 60674-8917

Remarks

Receive invoices electronically to avoid service charge fees (see reverse for details)

PACIFIC GAS & ELECTRIC COMPANY  
ANGELS CAMP GARAGE - ANG  
1108 MURPHY'S GRADE ROAD  
ANGELS CAMP CA 95222-9616  
UNITED STATES

Please refer to our Standard Terms and Conditions of Sale, available on our website at  
[www.lubricants.petro-canada.ca/termsandconditions](http://www.lubricants.petro-canada.ca/termsandconditions)

Invoice Mailing/Faxing Fees

Canadian \$ - \$2.00 per mailed invoice / \$1.00 per faxed invoice

US \$ - \$2.00 per mailed invoice / \$1.00 per faxed invoice

GBP - 2 GBP per mailed invoice / 1 GBP per faxed invoice

EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.

B209EPCA

**Petro-Canada America Lubricants LLC**

115 N. Oak Park Avenue #1C

Oak Park, IL 60301-1366

United States

**Invoice***When remitting  
please quote*

Invoice number	Customer number
922291274	3098714
Date	Page
Jan 25, 2019	1

**Sold to:**

PACIFIC GAS & ELECTRIC COMPANY  
SANTA ROSA GARAGE - SNG  
3965 OCCIDENTAL ROAD  
SANTA ROSA CA 95401-5855  
UNITED STATES

**Shipped to:**

PACIFIC GAS & ELECTRIC COMPANY  
SANTA ROSA GARAGE - SNG  
3965 OCCIDENTAL ROAD  
SANTA ROSA CA 95401-5855  
UNITED STATES

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	SANTA ROSA	712421264	J057B-19-841013
Inco terms	Supply point		
ZCR	A49402 VALLEY PACIFIC PETROLEUM SERVICES		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
DHP15BLK	DURON HP 15W-40 BULK	CA	180.000	USG	9.7100	1,747.80
	<b>** Sub-total **</b>					1,747.80
	CALIFORNIA USED OIL RECYCLING PROGRAM					43.20
	180.001USG \$24.00/ 100USG					
	CALIFORNIA MOTOR OIL FEE					9.00
	180.001USG \$5.00/ 100USG					
	Sales Tax					150.75
	@ 8.625%					

Terms	Payment due date	Total	1,950.75 US Dollar
Due 30 Days from Invoice Date	Feb 24, 2019		
Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)			

Please direct inquiries to:

Inquiries : [pcaorders@petrocanadalsp.com](mailto:pcaorders@petrocanadalsp.com)  
Sales : Arthur Gomez 877 730-2369

*Please remit payment to:*

Petro-Canada America  
Bank of America  
PO Box 74008917  
Chicago, IL 60674-8917

Remarks

**Receive invoices electronically to avoid service charge fees (see reverse for details)**

PACIFIC GAS & ELECTRIC COMPANY  
SANTA ROSA GARAGE - SNG  
3965 OCCIDENTAL ROAD  
SANTA ROSA CA 95401-5855  
UNITED STATES

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US \$- \$2.00 per mailed invoice / \$1.00 per faxed invoice

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EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.

B209EPCA



**Petro-Canada America Lubricants LLC**  
115 N. Oak Park Avenue #1C  
Oak Park, IL 60301-1366  
United States

*When remitting  
please quote*

## Invoice

Invoice number	Customer number
922291423	3801340
Date	Page
Jan 25, 2019	1

**Sold to:**  
**PACIFIC GAS & ELECTRIC COMPANY**  
**211 N THORNE AVENUE**  
**FRESNO CA 93706**  
**UNITED STATES**

**Shipped to:**  
**PACIFIC GAS & ELECTRIC COMPANY**  
**211 N THORNE AVENUE**  
**FRESNO CA 93706**  
**UNITED STATES**

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	FRESNO	712421354	J057C-19-840849
Inco terms	Supply point		
ZCR	A49402 VALLEY PACIFIC PETROLEUM SERVICES		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
HDXAW32DRM	HYDREX AW 32 HYDRAULIC OIL 205L DRUM	CA	1.000	DRM	564.1300	564.13
DHP15DRM	DURON HP 15W-40 205 L DRUM	CA	1.000	DRM	553.4400	553.44
	<b>** Sub-total **</b>					<b>1,117.57</b>
	<b>CALIFORNIA USED OIL RECYCLING PROGRAM</b>					<b>13.00</b>
	54.155USG \$24.00/ 100USG					
	<b>CALIFORNIA MOTOR OIL FEE</b>					<b>2.71</b>
	54.155USG \$5.00/ 100USG					
	<b>Sales Tax</b>					<b>89.13</b>
	@ 7.975%					

Terms	Payment due date	Total	1,222.41 US Dollar
Due 30 Days from Invoice Date	Feb 24, 2019		
Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)			

Please direct inquiries to:	Please remit payment to:
Inquiries : pcaorders@petrocanadalsp.com	Petro-Canada America
Sales : Arthur Gomez 877 730-2369	Bank of America
	PO Box 74008917
	Chicago, IL 60674-8917

Remarks
Receive invoices electronically to avoid service charge fees (see reverse for details)

PACIFIC GAS & ELECTRIC COMPANY  
211 N THORNE AVENUE  
FRESNO CA 93706  
UNITED STATES

Please refer to our Standard Terms and Conditions of Sale, available on our website at  
[www.lubricants.petro-canada.ca/termsandconditions](http://www.lubricants.petro-canada.ca/termsandconditions)

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GBP - 2 GBP per mailed invoice / 1 GBP per faxed invoice

EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.

B209EPCA

**Petro-Canada America Lubricants LLC**

115 N. Oak Park Avenue #1C

Oak Park, IL 60301-1366

United States

**Invoice****When remitting  
please quote**

Invoice number	Customer number
<b>922292587</b>	<b>3098650</b>
Date	Page
<b>Jan 25, 2019</b>	<b>1</b>

**Sold to:**

**PACIFIC GAS & ELECTRIC COMPANY  
CONCORD GARAGE - CNG  
1030 DETROIT AVENUE  
CONCORD CA 94518-2401  
UNITED STATES**

**Shipped to:**

**PACIFIC GAS & ELECTRIC COMPANY  
CONCORD GARAGE - CNG  
1030 DETROIT AVENUE  
CONCORD CA 94518-2401  
UNITED STATES**

Blanket order / Contract number	Purchase order number	Order number	Bill of lading number
	<b>CONCORD</b>	<b>712422014</b>	<b>J05DF-433423</b>
Inco terms	Supply point		
<b>ZCR</b>	<b>A77133 RAMOS OIL CO., INC</b>		

Product Code	Product Description	Origin City	Quantity Shipped	Unit	Unit Price	Amount
DHP15DRR	DURON HP 15W-40 208 LITRE DRUM	CA	2.000	DRR	553.8000	1,107.60
MOSYN53DRM	SUPREME SYNTHETIC 5W-30 DRUM	CA	2.000	DRM	645.5100	1,291.02
	<b>** Sub-total **</b>					<b>2,398.62</b>
	<b>CALIFORNIA USED OIL RECYCLING PROGRAM</b>					<b>52.39</b>
	218.311USG \$24.00/ 100USG					
	<b>CALIFORNIA MOTOR OIL FEE</b>					<b>10.92</b>
	218.311USG \$5.00/ 100USG					
	<b>Sales Tax</b>					<b>209.88</b>
	@ 8.750%					

Terms	Payment due date	Total	
<b>Due 30 Days from Invoice Date</b>	<b>Feb 24, 2019</b>		<b>2,671.81</b>
<b>Overdue amounts are subject to a late payment interest charge at a rate of 24% per annum (daily rate 0.06575%)</b>		<b>Total</b>	<b>US Dollar</b>

Please direct inquiries to:

Inquiries : [pcaorders@petrocanadalsp.com](mailto:pcaorders@petrocanadalsp.com)

Sales : Arthur Gomez 877 730-2369

Please remit payment to:

**Petro-Canada America  
Bank of America  
PO Box 74008917  
Chicago, IL 60674-8917**

Remarks

**Receive invoices electronically to avoid service charge fees (see reverse for details)**

PACIFIC GAS & ELECTRIC COMPANY  
CONCORD GARAGE - CNG  
1030 DETROIT AVENUE  
CONCORD CA 94518-2401  
UNITED STATES

Please refer to our Standard Terms and Conditions of Sale, available on our website at  
[www.lubricants.petro-canada.ca/termsandconditions](http://www.lubricants.petro-canada.ca/termsandconditions)

Invoice Mailing/Faxing Fees

Canadian \$ - \$2.00 per mailed invoice / \$1.00 per faxed invoice

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GBP - 2 GBP per mailed invoice / 1 GBP per faxed invoice

EURO - 2 Euro per mailed invoice / 1 Euro per faxed invoice

Please contact your Credit Account Manager to switch to electronic invoicing.